

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PRO TEM PARTNERS, INC.,)	
Plaintiff,)	
)	
v.)	
)	No. 05-11822-RCC
SEMICO RESEARCH)	
CORPORATION, INC.,)	
Defendant.)	

JOINT MOTION TO EXTEND DISCOVERY AND OTHER EVENTS

NOW COME the parties, by and through their attorneys, and hereby move this Honorable Court to extend the discovery and other deadlines by ninety (90) days.

In support of their Motion, the parties state that this case involves a course of dealings which took place over a number of years and involves multiple party and non party witnesses that reside outside of Massachusetts. The parties previously requested and received time extensions in order to explore settlement before taking depositions which involve witnesses in multiple states. The parties have been exploring settlement. Although the parties do not rule out the possibility of settlement, because there is no assurance that a settlement can be reached, they deem it prudent to proceed now to complete discovery.

Accordingly, to allow the parties to conduct discovery in an orderly manner, the parties submit that the discovery and summary judgment deadlines be amended as follows:

1. Fact discovery due by April 30, 2007;
2. Plaintiff to disclose expert by May 1, 2007;
3. Defendant to disclose expert by June 1, 2007;
4. Discovery to be completed by July 31, 2007;
5. Summary Judgment motions due by August 31, 2007;
6. Response to Summary Judgment motions due by September 30, 2007 (or 30 days after the motion is filed).

WHEREFORE, the parties move this Honorable Court to extend the discovery and other deadlines as set forth herein.

Respectfully submitted,

PRO TEM PARTNERS, INC.,

By its attorneys,

Respectfully submitted,

SEMICO RESEARCH CORP., INC.

By its attorney,

/s/ J. Allen Holland
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